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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

JEFFREY KING, ET AL.,
Defendants.

Case No.: 2:24-CR-01040-ROS-2

**JOINT MOTION TO CONTINUE
SENTENCING AND TO FILE
OBJECTIONS OR
CLARIFICATIONS TO THE PSR**

Defendant Jeffrey King and the UNITED STATES OF AMERICA, pursuant to Fed. R. Crim. P. 32, respectfully move this Court to continue the sentencing hearing in this case from April 15, 2025, to a date after August 12, 2025, which is the current sentencing date for codefendant Alexandra Gehrke. The parties further move to extend the time to file any objections or clarifications to the Presentence Report ("PSR") through July 15, 2025.

I. Relevant Procedural History

On January 31, 2025, Defendant Jeffrey King entered a guilty plea to Count 1 of the Superseding Indictment. At the conclusion of the Rule 11

1 hearing, the Court scheduled the sentencing hearing for Mr. King for April
2 15, 2025. (ECF No. 138).

3 **II. Factual Assertions**

4 The case presents complex issues, and upon conferring with each other,
5 the parties respectfully submit that they need additional time to respond to
6 the presentence report and prepare for sentencing fully. The parties agree
7 that they will be able to accomplish that preparation after August 12, 2025,
8 the current sentencing date for Alexandra Gehrke, a codefendant in this
9 case. The parties further request additional time to file any objections to
10 the PSR through July 15, 2025. The parties will be available for sentencing
11 that month.

12 This is the first request to continue sentencing in this case.

13 **III. Memorandum of Law**

14 A “court must impose sentence without unnecessary delay.” Fed. R.
15 Crim. P. 32(b)(1). However, a “court may, for good cause, change any time
16 limits prescribed in [Fed. R. Crim. P. 32].” Fed. R. Crim. P. 32(b)(2).

17 **IV. Certificate of Conference**

18 The government joins in this motion.

19 **V. Conclusion**

20 Mr. King and the Government, based on the foregoing assertions and
21 argument, pray that the Court continue the sentencing hearing in this case
22 from April 15, 2025, to a date after August 12, 2025, which is the current
23 sentencing date of Defendant Alexandra Gehrke. The parties further
24 request additional time to file any objections or clarifications to the
25 Presentence Report through July 15, 2025.
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1 Dated this 29th of March, 2025.
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4 Respectfully submitted,
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7 /s Brian T. Rafferty, Esq.
8 Brian T. Rafferty, Esq.
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